

U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street

New York, New York 10007

December 23,

VIA ECF

The Honorable Alison J. Nathan United States District Judge United States Courthouse 40 Foley Square, Room 2102 New York, NY 10007

JAN 0 6 2020

Re:

Doe v. U.S. Immigration and Customs Enforcement,

19 Civ. 8892 (AJN)

Dear Judge Nathan:

This Office represents defendants (collectively, the "Government") in the above referenced matter. The Government respectfully writes, with the consent of plaintiffs, to align the deadline for production of the administrative record in this action with the date for the production of the administrative record in *New York v. ICE*, 19 Civ. 8876 (JSR) (the "*New York* action"). On December 19, 2019, Judge Rakoff issued a decision in the *New York* action, which denied the Government's motion to dismiss and requires the administrative record to be filed no later than January 3, 2020. In a November 22, 2019 letter to Your Honor, we stated that the parties will present Your Honor with a new case management plan within 3 days of a decision in the *New York* action which aligns the discovery dates with the new dates in the *New York* action. Therefore, we write to alert Your Honor that the parties have agreed that the administrative record in this action will be filed by January 3, 2020. The parties are still conferring about other discovery deadlines, and will update the Court with another letter, and a new Case Management Plan and Scheduling Order, once we have agreed to the additional deadlines.

We thank the Court for its consideration of this letter.

The parties shall submit a proposed amended case management plan by January 10, 2020. SO ORDERED.

SO\ORDERED:

16/30

HON, ALISON J. NATHAN UNITED STATES DISTRICT JUDGE

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Respectfully,

GEOFFREY S. BERMAN United States Attorney

By:

/s/ Rebecca R. Friedman

REBECCA R. FRIEDMAN TOMOKO ONOZAWA

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cc: All Counsel of Record (via ECF)